1 2	UNITED STATES DI EASTERN DISTRICT O	, STRICT COURT F PENNSYLVANIA	Pag
3 4	MERCY HEALTH SYSTEM OF SOUTHEASTERN PENNSYLVANIA, Plaintiff,		
5 6 7 8	vs. CSI FINANCIAL, INC., Defendant.	CIVIL ACTION CASE NO. 01-CV-5	681
9 10	FIRST NATIONAL BANK OF MONTANA INC. and CSI FINANCIAL, INC., Plaintiffs,	· .	
11 12 13	VS. MERCY HEALTH SYSTEM OF SOUTHEASTERN PENNSYLVANIA,	CIVIL ACTION Consolidated	
L4 L5	Defendant.		
. 6 . 7	DEPOSITION OF NEYSHA	ANN HUMPHREYS	
.8	5,016711 1	WALSTAD COURT REPORT LAST CHANCE GULCH	ING
0	HELENA, MC	NTANA ANATA	
<u>1</u> 2 3	JULY 14, 2		A CANADA MANAGA MAN
:	CHRISTINE D. L REGISTERED PROFESSIO WAYRYNEN & LIVELY REPO	NAL REPORTER	
	1940 DEWEY BOUL! BUTTE, MONTANA	EVARD	

Page 2		
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2	APPEARANCES	
3	AFFEARANCES	
4	FOR MERCY HEALTH SYSTEM:	•
5 .		·
6	STACEY A. SCRIVANI	
7	ATTORNEY AT LAW	
/	STEVENS & LEE	
8	111 NORTH SIXTH STREET	
9	READING, PENNSYLVANIA 19603-0679	
10		
11	FOR CSI FINANCIAL, INC.:	
12		1
	PATRICK J. EGAN	
13	ATTORNEY AT LAW	
	239 SOUTH CAMAC STREET	
14	PHILADELPHIA, PENNSYLVANIA 19107	
L 5		総正を結びて発
.6	FOR FIRST NATIONAL BANK OF MONTANA:	
. 7		
	CHRISTOPHER J. DAY	
8	CHRISTOPHER M. BRUBAKER	
	ATTORNEYS AT LAW	
9	421 CHESTNUT STREET	
	PHILADELPHIA, PENNSYLVANIA 19106	Religion
0	19106	No. of the last of
<u>l</u>		
	ALSO PRESENT: RUSS ERDMAN	-2 (Catalogue)
)	JAMES T. O'BRIEN	
	orania de la composición dela composición de la composición de la composición dela composición de la composición de la composición de la composición dela composición de la composición de la composición de la composición dela composición de la composición de la composición dela composición de la composición de la composición de la comp	
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Page 89 Yes. Page 91 give rise to this review in any respect? Q. And with respect to audits, would those documents 2 MR. DAY: Objection. continue to exist without regard to retention policy? 2 A. Audit reports, yes; workpapers, no. 3 THE WITNESS: Partially. Q. Do you have - can you give me an estimate, was it (By Ms. Scrivani) What do you mean by that? 4 5 10 times more or less that you performed a review of Well, it was mostly a concern over, with the 6 year-end audit approaching, whether all of the recoursed 7 chargebacks or reviews? accounts that had been -- that had slipped through with 8 MR DAY: Objection. THE WITNESS: I would say maybe five. the computer conversion had been identified. We were 9 more looking for who owed us what money and that valid Q. (By Ms. Scrivani) Do you recall the years in patient accounts were active accounts, were what was on 10 11 which they were performed? 11 the books. 12 A. No. Q. Do you recall if you performed such a review in Q. And that was with respect to all hospitals that 13 12 13 were in the program? 2001? 14 15 A. Yes. A. Yes. Q. You did in fact perform one that year? Q. What did you mean when you said that you were 15 trying to verify that large hospitals were not A separate report separate from the external 17 offsetting against recourse, if I got that correct? 18 A. There was one small hospital that would give us Q. Well, you tell me. new accounts and then we would charge them back the A. I don't know that I did one separate from the 20 recourse and chargeback accounts, so we would exchange 21 so there was no dollars transferred. And that worked on Q. With respect to the - your estimate of five, when 21 a regular ongoing basis. It turned fine. you gave me that estimate, did you intend those five to 22 23 23 The only other hospital that I'm aware of that ever be included as part of an external audit or as something processed that way was on a large basis was Mercy. And separate from the external audit? that was when, then we weren't getting new accounts, the Page 90 A. Both. Page 92 chargeback that built up on the account and not been 2 Okay. Of those five, do you recall how many were returned, recoursed and returned. And we needed to 3 performed separate from an external audit? 2 verify that that was not going on. 4 4 Q. With respect to Mercy or with other hospitals? Q. With respect to the review you can recall in 2001, 5 A. Other hospitals. There were large -- several that was not separate from the external audit? 5 6 large new ones that came on. And we were just -- we 7 MR. DAY: Objection. THE WITNESS: No. It was separate from the were testing processes. 8 Q. Do you recall if you determined during this review 9 external audit. whether there were other large hospitals in the program Q. (By Ms. Scrivani) It was separate, okay. 10 that were using this offsetting? 10 Do you recall when in 2001, that was performed? 11 A. We did not identify any others that were doing it. 12 11 A. November. Q. Tell me about this conversion and you were trying Q. Do you recall what prompted that review at that 12 13 to identify recourse accounts. What conversion are you 13 14 time? A. We were wanting to determine whether there were --14 referring to? 15 A. CSI converted from an older computer system to a whether all of the accounts that had been identified for 15 16 recourse as a result of the computer conversion had been 17 16 new computer system. Q. Do you know when that happened? 17 identified and processed. 18 18 It was in December of 2000. Q. Was that the only reason? 19 Do you know what they converted from and to? A. And to verify that other large, new hospitals were 19 Q. 20 20 not -- were not requesting offsets of new accounts with A. No. Q. What about that conversion raised issues that you recoursed accounts providing for accounts that should be 21 recoursed to be retained on the books longer than they needed to review? 23 We got word from CSI that there were accounts that should be. had been marked for conversion -- for recourse, that on 24 Q. Did the dispute that arose between CSI and Mercy

the conversion, the system inadvertently dropped the

Page 113 THE WITNESS: I can say that the ones that were 1 invoiced were reconciled and balanced. That is all I can artest -- that's all I can attest to. Q. (By Ms. Scrivani) And ones that wouldn't be 4 invoiced are ones that are still in CSI's account, CSI's computer system? 7 MR. DAY: Objection. THE WITNESS: Yes. But they are all in CSI's 8 9 computer system. (By Ms. Scrivani) Is the bank on a calendar-10 i] Yes. Q. --year for year-end reviews? 12 13 A. Yes.

- Q. What if, in the offsetting example, turning your 14
- example around a little bit, if the recourse amount was
- a hundred thousand but the new accounts were only
- 17
- A. There would only be invoiced the 50,000 because 19
- Mercy wasn't accepting the amounts that weren't offset.
- Q. What do you mean when you say Mercy wasn't 20 accepting the amounts that weren't offset? 21
- 22
- A. We got -- we got new accounts for the dollars that 23
- were recoursed.
- Q. We being the bank? 24
- A. Yeah, up through a certain date. And then 25

- Page 115 found out about the offsetting, did the bank not know
- that Mercy was offsetting new accounts for return and 3
- A. That's correct.
- Q. And when did the bank learn about that? 5
- 6 A. I do not recall.
- Q. How did the bank learn about it? 7 8
 - A. I do not recall.
- Q. Did you know at one time and you just don't 9
- remember or was that not something you ever knew? 11
- A. I don't know. I don't recail one way or another. 12
- Q. But once the bank learned of this offsetting as
 - opposed to cash payment, then they required CSI to
- invoice all recourse?
- 15 A. Yes.
- Q. And was that the large recourse that was invoiced 16
- to CSI in July of 2001?
- 18 A. Yes.
- Q. Do you know if that invoice in July of 2001
- included accounts that had previously been invoiced to 21
- A. Yes, my understanding was it was all open accounts
- 23 at that time.
- Q. What do you mean when you say all open accounts?
- A. All accounts that had not been paid. Evidently

Page [[4

- everything was invoiced in the summer of '02. I can't
- remember. It must have been '02, '01, '01, I don't
- remember. I'm sorry.
- Q. But when you say Mercy wasu't accepting recourse, 3 what is that based on?
- A. Based on representations from CSI. б 7
- Q. Who at CSI?
- 3 A. Cindy Dorr and Bob Jaeb.
- 9 Q. Anyone else?
- A. No, they're the ones I talked to. 10
- Q. Do you know if the bank did anything to confirm 11 12
- those representations?
- 13 A. No.
- Q. No, you don't know or no, the bank didn't? 14
- A. I know that the bank I don't know for sure. I 15
- know that the bank had CSI do a billing of invoicing
- of all accounts when they found out about the offsetting
- provision and the amount that was building up.
- Q. But you don't know if the bank did anything to
- confirm CSI's representations? 20
- 21 A. No.
- 22 MR. DAY: No, you don't know? 23
 - THE WITNESS: No, I don't know.
- Q. (By Ms. Scrivani) So when you say that you know 24
- that the bank had CSI invoice all the recourse when it

Page 116 there was -- my understanding is there were some that

- had been invoiced and not paid and then -- and then new
- ones that hadn't been billed. So it was a combination.
- Q. Do you know how many of the accounts that appeared
- on that that were invoiced at that time had
- previously been invoiced?
- 7 A. No, I do not,
- 8 Q. Did you ever know? 0
- A. No, I did not.

MR. BRUBAKER: Stacey, can I find out just how 10 much longer you think you're going to be? Is this a time to break for lunch? 12

MS. SCRIVANI: I was actually going to say, this is a good time to break for lunch. And I don't think we'll be able to stan-

THE VIDEOGRAPHER: We're going off the record. The time is 12:14 p.m.

(Whereupon, the luncheon recess was taken.) 13 19

THE VIDEOGRAPHER: We are now back on the record. The time is 1:11 p.m.

- Q. (By Ms. Scrivani) Mrs. Humphreys, before we went 21
- to lunch, one of the questions I asked you was how CSI
- was able to track the recourse that they that as a result of the conversion had had their codes dropped.
- And I think you told me that they were able to run a

13

14

15

16

17

EXHIBIT "F"

ID:6102782060

PAGE

8/2

asiness Account Statement

MEDICAL CENTER

PNCBANK

018319892

For the period 11/81/1889 to 11/30/1889

Account number:

86-1133-6132

Page 9 of 12

CH Credits	ad Other Credits - continued	-
ite est	- continued 106 transactions for a total of \$ 11,368,361.38	
sted	Amount description	
1/22	64,895.63 ACH Credit Prov Remit Ind.	, Referen- numb
1/22		0001999322189117
1/22	9,386.92 ACH Credit Medicare A Veritus Medicare 390156B 5,065.50 ACH Credit Rough	0001999323249515
1/22		0001999323249518
/23	5,065.50 ACH Credit Prov Remit Independence Blu 0001506 52,254.23 ACH Credit Prov Remit Independence Blu 0001105 14,125.72 ACH Credit Medicare A Variance Blu 0001105	0001999322189116
/25		
/23		0001999323234908
/23		0001999326347470
/23	Cloud Filly Report Indiana, I	0001999328347470
/24	40.00 ACH Credit Prov Remit Independence Blu 0005613 55,459.93 ACH Credit Prov Remit Independence Blu 0001506	00019993232349089
/24		00019993232349087
/24	15,775.85 ACH Credit Medicare A Veritus Medicare 390156B	00019893263227267
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/26	4,068.97 ACH Credit Medicare A Veritus Medicare 890156A	00018983253227292
2 6	The state of the s	00019993274288755
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30	American Europea 987-0864/18	00019993338676892
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10	165.24 ACH Credit Settlement	00018993337114509
0	American Express 2374953420	00019993340043893
· ·	48.74 ACH Credit Settlement	
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	o wansactions for a total of \$ 1.906 571 co	
	Amount description	,
3	1,352,227.87 Fed Wire In 012285 () 1 mentara	Reference
3	544,914.31 Fed Wire In 012284	number
}	9,529.75 Fed Wire in 014442	W012285 1103
	5,525.75 Fed Wire in 014442	W012284 1103
ments	1 transports:	W014442 1123
<i>y</i>	1 transaction for a total of \$ 14.00	
	Transaction Amount description	. .
	14.00 Deposit Adjmt 90038	Reference number
	L	018319801

ID:8102782060

PAGE

INACLE Previous Day Detail Report 12/4/99

	ransactions: unt Referenc	a Namet	Avai	lability ———		
ekbox Depo	an Referenc	e Number	Zero Day Float	One Day Float	2+ Days Float	
ockbax De						
	.06 00000008281		168,899.06	201.01		,
•	WHLS LBX I		022899557	321,217.00	0.00	
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·	WHLS LBX I	DEP 8281	023602281	20,181.00	956.00	
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	WHLS LBX I	DEP 8281	022899630	155.00	0.00	
2,818.	11 00000008265		100.11	2,718.00	0.00	
	WHLS LBX I	DEP 8265	025533618	2,710.00	0.00	
747.	22 00000008281		707.22	40.00	0.00	
4.40	WHLS LEX D	DEP 8281	022899608	10.00	0.00	
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Page 8 of 50 Filed 01/31/2005

FEB-25-03 13:31 FROM:SGH BUSINESS OFFICE

ID:5102782050

PAGE 8/2

INACLE Previous Day Detail Report

11/24/99

s-C ate: 11/23/99

'NC Bank, Philadelphia

511336132

USD MCMC DEPOSIT

Debit Transactions:

Amount Reference Number

BA Debits

ZBA Debits

709,328.64 08612821607

FUNDS TRANSFER TO ACCT 8612821607

oin and Currency Shipped

Coin and Currency Shipped

500.00 000000000000

MONEY ROOM ORDER COIN/CURRENCY 000000000

709,828.64	Debit	Total.
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Amount Reference Number		Zero Day Float One Day Float		*******	
ockbox Deposits			ZCIO Day Float	One Day Float	2+ Days Float
Lockbox Deposits					
77,989.21 000000 WHLS	BX DEP	8281	258,774.21 022599021	18,318.00	897.0
	BX DEP	8281	292.69 0282717 74	268,069.00	47.0
	BX DEP	8281	21,464.23 022599068	23,972.00	1,161.0
	BX DEP	8281	161.19 028271800	10,845.00	3,071.0
1,945.83 0000000 WHLS I	BX DEP	8265	100.83 025592165	1,845.00	0.0
609,018.15 Lockbox	Deposits Ton	ıls	280,793.15	323,049.00	5,176.0

ACH Credits	16
ACH Credits AOH Credits	700

//,132.20 ACA Credits 10	77,152.26	0.00	0.00
0001506 77,152,26 ACH Credits To	PROV REMITINDEPENDENCE BLU	U.UU	0.00
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0005613	PROV REMITINDEPENDENCE BLIJ	0.00	0.00
1,820.00 00000000000	1,820,00	0.00	0.00
390156A	MEDICARE AVERITUS MEDICARE		0.00
8 ,912.31 00000000000	8,912,31	0.00	0.00
390156B	MEDICARE AVERITUS MEDICARE	2.20	0.50
14,125.72 00000000000	14,125,72	0.00	0.00
0001105	PROV REMITINDEPENDENCE BLU	40	0.00
52,254.23 00000000000	52,254.23	0.00	0.00
ACH Ciclis			

Transfer CR-Wire

Muney Transfer CR-Wire 9,529.75

FED WIRE IN

9,529.75

0.00

0.00

014442 ORIGINATOR: FIRST NATIONAL BANK OF MONTANA LIBBY MT FIRST NATIONAL BANK OF MONTANA, INC ABA:092102851

006077

ID:6102782060

PAGE 9/27

'INACLE Previous Day Detail Report

11/24/99

OBI:PNC BANK NATIONAL ASSOCIATION PHILADELPHIA PA
BBI:HOSPITAL BATCH # 2011199 20211199 HSI HOSP PATIENT
LOAN PRGM FNDG BENEFICIARY:MERCY CATHOLIC MEDICAL
CENTER AC/8611336132 MERCY CATHOLIC MEDICAL CENTER
8611336132 PHILADELPHIA PA ATTN DOUG SMITH
TRN:991123014442 FEDREF:00010 DATE:991123 TIME:1315
Money Transfer CR-Wire Tota 9,529.75 0.00

cy Deposited

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Coin and Currency Deposited			
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Deposits			
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7,565.69 Deposits Totals	684.69	6,866.00	15.00
709,828.64 Credit Totals	374,722.64	329,915.00	5,191.00

ID:5102782060

PAGE

number

178204601995 PHL

178204601895 PHL

178204601995 PHL

2/27

Business Account Statement

PNCBANK

TY HOSPITAL H SYSTEM

1/01

1/03

1/04

For the period 11/01/1999 to 11/30/1999

Account number:

86-1282-1594

Page 4 of 6

Credits - continued	
Transaction Amount description	Refere
16,026.33 ACH Credit Prov Remit Independence Bly 000 1125	num
12,148.88 ACH Credit Prov Remit Independence Blu 0001125	00019993145139
10,800,00 VACH Credit Medicare A Veritus Medicare 395915	00019993166569
7,008.52 ACH Credit Metlicare A Veritus Medicare 390915	00019993197318
18,209.59 ACH Credit Medicare A Veritus Medicare 300215	00019993197318
95,358.57 ACH Credit Medicare A Veritus Medicare 890215	00019983200428
56,814.22 ACH Credit Medicare A Veritus Medicare 300215	00019993211295
16,596.00 ACH Credit Medicare A Vering Medicare 805215	00019993221979
9,598.10 ACH Credit Prov Remit Independence Rtv 0003 125	00018993221879
15,806.27 ACH Credit Medicare A Verius Medicare 300915	00019993211108
13,458.18 ACH Credit Prov Remit Independence Rhy 0001125	00018993Z32495
34,613.09 ACH Credit Medicare A Veritus Medicare 390215	00019993221891
6,928.39 ACH Credit Prov Remit Independence Blu 0001125	00019993263474
6,075.00 ACII Credit Medicare A Veritus Medicare 898215	00019893232349
29,822.92 ACH Credit Prov Remit Independence Bly 0001125	00019993263474
22,424.57 ACH Credit Medicare A Verious Medicare 800915	00019593263227
12,825.00 ACH Credit Medicare A Veritus Medicare 808215	00019993274266
26,497.67 ACH Credit Medicare A Veritus Medicare 390215	00019993274268
10,614.00 ACH Credit Medicare A Verius Medicare 395215	00019993285565
9,149,97 ACH Credit Prov Remit Independence Blu 0001125	00019993285565
64.283.99 ACH Credit Medicare A Veritus Medicare 390215	00019993274117
(19,385.41) ACH Credit Proy Remit Independence Bin 0001195	000199933062376
18,413,00 ACH Credit Medicare A Veritus Medicare 395215	000199932852670
24.30 ACH Credit Settlement American Express 2374055 104	0001989330623 7 6 000188933366796
9,238.26 ACH Credit Medicare A Veritus Medicare 390215	000199933371145
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1 transaction for a total of \$ 362,642.46	
Transaction	nsteten
362,642.46 Fed Wire In 019048 OK Brof Montaine 000070	лить W019043 11
2 transactions for a total of \$ 963.61	
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	ոստե
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Тталзаction	Reference
	Transactions for a total of \$ 1,308,094.71 Vansaction Searfplan 16,026.38 ACH Credit Prov Remit Independence Blu 0001125 12,148.88 ACH Credit Medicare A Veritus Medicare \$98215 7,008.52 ACH Credit Medicare A Veritus Medicare \$90215 18,209.59 ACH Credit Medicare A Veritus Medicare \$90215 18,209.59 ACH Credit Medicare A Veritus Medicare \$90215 56,814.22 ACH Credit Medicare A Veritus Medicare \$90215 56,814.22 ACH Credit Medicare A Veritus Medicare \$90215 16,596.00 ACH Credit Medicare A Veritus Medicare \$90215 16,596.01 ACH Credit Medicare A Veritus Medicare \$90215 16,806.27 ACH Credit Medicare A Veritus Medicare \$90215 16,806.27 ACH Credit Medicare A Veritus Medicare \$90215 18,4013.09 ACH Credit Medicare A Veritus Medicare \$90215 18,4013.09 ACH Credit Prov Remit Independence Blu 0001125 4,013.00 ACH Credit Medicare A Veritus Medicare \$90215 6,928.39 ACH Credit Medicare A Veritus Medicare \$90215 6,928.39 ACH Credit Medicare A Veritus Medicare \$90215 12,825.00 ACH Credit Medicare A Veritus Medicare \$90215 12,825.00 ACH Credit Medicare A Veritus Medicare \$90215 10,614.00 ACH Credit Medicare A Veritus Medicare \$90215 11,413.00 ACH Credit Medicare A Veritus Medicare \$90215 12,430 ACH Credit Medicare A Veritus Medicare \$90215 13,413.00 ACH Credit Medicare A Veritus Medicare \$90215 14,725.00 ACH Credit Medicare A Veritus Medicare \$90215 1,4725.00 ACH Credit Medicare A Veritus Medic

Amount description
230.00 PNC Merchant Deposit 178204601995

839.00 PNC Merchant Deposit 178204601995

215.00 PNC Merchant Deposit 178204601995

Value Date 10-30-99

ID:6102782060

PAGE

NACLE Previous Day Detail Report

11/22/99

3-O. ite: 11/19/99

NC Bank, Philadelphia

12821594

USD MCH DEPOSIT

Debit Transactions:

Credit Transactions:

Amount Reference Number

iA Debits

ZBA Debits

479,843.87 08611336159

FUNDS TRANSFER TO ACCT 8611336159

Amount	Reference N	umber	Zero Day Float	One Day Float	2+ Days Float
ockbox Deposits					
Lockbox Deposi	ts				
21,140.29 (00000008279		244.29	20,896.00	0.00
,	WHLS LBX DEP	8279	H222252655		
8,766,27 (00000008279		595.27	8,171.00	0.00
	WHLS LBX DEP	82 7 9	024717252		
	Lockbox Deposit		839.56	29,067.00	0.00
-	00000000000		56,814.22		0.00
	390215 00000000000	MEDICARE A	AVERITUS MEDIC 16,596.00		0.00
	39S215	MEDICARE	AVERITUS MEDIC		0.00
9,593.10	00000000000 0001125	PROV REMI	9,593.10 TINDEPENDENCI	E BLU	
83,003.32	ACH Credits Tot	als	83,003.32	0.00	0.00

Money Transfer CR-Wire				1/1-96, 145.90
Money Transfer CR-Wire		0.00	0.00	
362,642.46 FED WIRE IN	362,642.46		00,0	
ORIGINATOR:FIRST NATION	AL BANK OF MONIA	MY LIRBA WI		0/p-266,496.5
FIRST NATIONAL BANK OF I	MONTANA, INC ABA:	:092102851		77 - 266, 710.5
OBI:PNC BANK NATIONAL A	SSOCIATION PHILAI	DELPHIA PA		,
BBI;HOSPITAL BATCH# 2041	1179 CSI HOSP PATU	INT LOAN PRGM		
FNDG BENEFICIARY:MERCY	COMMUNITY HOSP	ITAL AC/8612821594		
MERCY COMMUNITY HOSPI	TAL 8612821594 PHIL	ADELPHIA PA		606030
TRN:991119019043 FEDREF:0	0003 DATE:991119 TI	ME:1419		000000
362 642 46 Money Transfer CR-Wire Total	362,642.46	0.00	0.00	1

- Availability ·

The second secon	مستنفه والمهر ومالوسط فليد والمتنفيل والمستنوعات ويتوقين بالمجتبر بدوستها بتبرقي بتبار براسد والمتنا يتوفي وال		
Deposits			
Deposits 4,291.53 0000000000 DEPOSIT	701.53 025669773	3,590.00	0.00
4,291.53 Deposits Totals	701.53	3,590.00	0.00
479,843.87 Credit Totals	447,186.87	32,657.00	0.00

Islness Account Statement

ID:6102782060

PAGE

901225

838107 1037501 1440946

024440947

PNCBANK

For the period 12/01/1999 to 12/31/1999

Account number:

86-1282-1594

il	Page 4 of 6		
Partie 124	d Other Credits - continued	e ,	
etault?			
	59 transactions for a total of \$ 1,324,390.00		
	Amount description		
	1,550.40 /ACE C	D.4	
	168.00 ACH Credit Prov Remit Amerikaalth / NJ 0001125	na;en gren	mber
		0001999348219	477R
		0001989347093	4889
		0001999349328	1847
		00019993481951	614
		00019993504071	907
		000199835040719	915
		000199934930204	r i u 1Po
		000199835147822	20
		000199935147822	
		000188935038975	73
	PINCELLARY ALTERNATION AND THE STREET BUILDING BUILDING BOOK AND THE	0001999354566923	7 1
	5,621.42 ACH Credit Prov Remit Independence Blu 0001125 1,948.96 ACH Credit Medicare A Veritus Medicare 390215 189,193.49 ACH Credit Prov Remit Independence Blu 0001125 18,807.00 ACH Credit Medicare A Veritus Medicare 3001125	0001999351463074	
		0001999358690809	E
. **.		00019983545372188	
)	9/00/3.09 J 3 C 11 A	00018993560539330	
		00018993560539340	
		00019993555571842	
	91444.00 V 2 C D C 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	00019993671197517	:
•		00019993671197525	
		00019993560305581	
		00019933560305337	
		00019993571059201	
	ソロリロニ・ロー・ノコイリエア・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・	00019993581557198	′ ;
		00019993581557207	2
		00019993612436744	, -
	141904.00 74741 A 2100 1918/0000 90 0000	00018953623237835	
	FELLINE VILVACITY A	00019993634651242	
	#MARKALL FOR THE COLUMN TO THE PROPERTY OF A STATE OF THE PROPERTY OF THE PROP	00019983634851238	
		00018993822879044	
	10,800.00 ACH Credit Medicare A Veritus Medicare 390215 1,469.67 ACH Credit Prov Remit Independence Illy 600215	00019993845764633	
fers In	1,469.67 ACH Credit Prov Remit Independence Blu 0001125	00019893645764629	
a. z. 111	1 transaction 1	00019995534437339	
	1 transaction for a total of \$ 5,522.96	- ,-0050445/339	
	Amount description		(Invest
	5.522.96 Fed Wire In 017914 CK of Minute	Reference	
		number	
	1 transaction for a total of \$ 10,00	W017814 1216	enenc.
	Amount Jascription		ruip _#
2	10.00 Deposit Adjust 959083	n	3 4 659.
	r vrantr noa083	Reference number	049375

INACLE Previous Day Detail Report

12/17/99

s-C. ate: 12/16/99 'NC Bank, Philadelphia

112821594 Debit Transactions. USD MCH DEPOSIT

Dent Truit		
Amount	Reference Number	
BA Debits		
ZBA Debits	00411074750	
108,523.62	08611336159 FUNDS TRANSFER TO ACCT 8611336159	;
	FUNDS TRANSPER TO ACCT 3811330133	

Credit Transa Amount nckbox Deposits Lockbox Deposits 35,407.04 00	Reference N			ilability	
ockbox Deposits Lockbox Deposits	Welci cure.	nmher	Zero Day Float	One Day Float	2+ Days Float
Lockbox Deposits		distant.			
Lockbox Deposits					
3 4 ALT (1144 UR)			101.04	4 35,201.0	0 105.00
25 -0:10 - 105	HLS LBX DE	8279	027236031		
	ockbox Deposit		101.04	35,201.0	0 105.00
CH Credits					
ACH Credits				a 0.0	0.00
19,757.04 00	000000000		49,757.0	7	,O
	90215	MEDICARE A	VERITUS MEDI		o.00
15,941.48 00	0000000000		15,941.4		JU 0.00
00	001125		TINDEPENDENC	2 0.0	0.00
65,698.52 A	CH Credits To	tals	65,698.5	2 0.1	,g 0.50
Money Transfer C.	R-Wire				
Money Transfer	CR-Wire				იი 0.00
5,522.96			5,522.9	6 0.0	JU 0.00
	ED WIRE IN		017914		
_	~~ ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	FIRST NATIO	NAL BANK OF I	MONTANA LIBB	YMT
_		7 እ የ ነው ላ እበረ <i>በ</i> እ	R MONTANA. IN	C 888:03410563	L
_		C X T A 177 (ACCENTATION		1 A
_		' ጉ ▲ 'ፐ/ፓኒኒ' #ጎበ <i>ል</i>	.12149 ('SLHUSE	LAITIM! TOUL	1 7 7 7 7 7 1 T
_	THE PARTY OF THE P	ソベメロシルルぼせん	'Y COMMUNIE Y	TOSLITATIVE VO	00170777
•	ATTROVE COM	AT INTY HOS	PITAL 86128213:	34 LUIPANCIE II	IA PA
ı.	MERCI COME	7914 FEDREF	:00014 DATE:991	1216 TIME:1331	
5,522,96 1	Money Transfer	CR-Wire Total	5,522.5)6 0.	0.00
Miscellaneous Cre Miscellaneous C	ente.				0.0
Miscellaneous C	04601995000		10.	00 0.	.00. 00.
10.00	PNC MERCHA	NT DEPOSIT	178204601995		
	Miscellaneous	Credits Totals	10.	00 0	0.0
Denosits				•	
posits	******		1,340.	.10 496	5.00 49.0
	00000000000	(24676406		
	DEPOSIT		1,340.	.10 496	5.00 49.0
1,885.10	Deposits Total	•	2,2 10.	· - -	
	Credit Tota		72,672	.62 35,697	7 00 154.0

006082

ID:6102782060

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178185012992 PHL

siness Account Statement

PNCBANK

DICAL CENTER

For the period 12/01/1999 to 12/31/1999

Account number:

86-1133-6132

Page 10 of 12

ands Transfers In		2 transactions for a	total of \$ 14,589.12	2		
341+	Amount	Transaction	SKotmontana		Refer	
2.716	100	Fed Wire In 017918	Mondane	~	nur W017918	mber
2/21	4,868.40		- served		W007428	
Adjustments	**************************************	6 transactions for a	total of \$ 411.41			
Data poeted	Amount	Transaction description			Refer nun	rence mber
2/03	1.00	Money Room Deposit C VALUE DATE 12-01-99	redit Adj. 00000000		1203	0350
2/08	Ø86.00	Credit Memo			03730	4677
2/09	/ 100.00	Deposit Adjmt 97537			02341	6283
12/13	9.00	Money Room Deposit C	redit Adj. 00000000		1213	1083
12/15	<u></u> 215.41	Credit Memo			028198	8438
12/20	50.00	Deposit Adjunt 98183			023658	8416
Other Credits		15 transactions for a	a total of \$ 4,407.20)		
Date costed	Amental	Transaction description			Refere nun	mbet enca
12,	(3 <u>25,00</u>)	PNC Merchant Deposit	178165012992		178165012992	PHL
227	18.20	PNC Merchant Deposit	178165013990		178165013990	PHL
	47.00	PNC Merchant Deposit	178165012992		178155012992	PHL
12/08	58.00	PNC Merchant Deposit	178165012992		178165012992	PHL
12/10	100.00	PNC Merchant Deposit	178165014998		178165014998	PHL
12/13	100.00	PNC Merchant Deposit	178165014998		178165014959	PHL
12/14	600.00	PNC Merchant Deposit	178165013990		178165013990	PHL
12/20	105.00	PNC Merchant Deposit Value Date 12-18-00	178165012992		178185012992	PHL
12/21	925.00	PNC Merchant Deposit	178165014998		178165014998	PHL
2/28	911.00	PNC Merchant Deposit	178165014998 ·		178165014998	PHL
12/23	47.00	PNC Merchant Deposit	178165012992	000055	178165012992	PHL
2/24	595.00	PNC Merchant Deposit	178165014998 —	006083	178165014998	PHL
2/28	311.00	PNG Merchant Deposit	178165012992		178165012992	PHL
12/30	75,00	PNC Merchant Deposit	178165012992		178165012882	PHL
	1	h	1-010-01000			

Checks and Other Debits

ACH Debits		3 transactions for a total of \$ 1,289.00	
Date posted	Amount	Transaction description	Raference number
12/01	1,043.08	ACH Debit Reversal Independence Blu 0001105	00019993340576782
12/03	215.92	ACH Debit Lease Pmt Ladco Leasing 9916755	00019993382941165
15	30.00	ACH Debit Misc Chg Ladco Leasing 9916755	00019993437173135

\ 195.00 PNC Merchant Deposit 178165012992



12/31

ID:5102782060

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INACLE Previous Day Detail Report

12/1**7/99**

s-O1 Date: 12/16/99

NC Bank, Philadelphia

11336132

USD MCMC DEPOSIT

Debit Transactions:

Amount Reference Number

3A Debits

ZBA Debits

569,232.70 08612821607

FUNDS TRANSFER TO ACCT 8612821607

oin and Currency Shipped

Coin and Currency Shipped

850.00 000000000000

MONEY ROOM ORDER COIN/CURRENCY 00000000

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	D - L - 4	1000
የመስ ሲያጣ ግዜ	1100111	1 () () L
- 5 /C 1152/U	10000	7 C
570,082.70	-	

	Availability			
nber	Zero Day Float Or	ne Day Float	2+ Days Float	
			•	
	225.537.45	11,646.00	1,686.00	
8281	022085560	130,417.00	1,988.00	
8281	027233448	-	857.00	
8281	027233407	•	0.00	
8265	027236022		4,531.00	
	8281 8281 8281	225,537.45 8281 022085560 3,446.88 8281 027233448 102.08 8281 027233407 104.16	225,537.45 One Day Float 3 225,537.45 11,646.00 8281 022085560 3,446.88 130,417.00 8281 027233448 102.08 62,889.00 8281 027233407 104.16 1,995.00 8265 027236022	

606084

ACH Creuus	ACH	Credits
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CH CIBILIS			0.00
ACH Credits	47,619.00	0.00	0.00
47,619.00 00000000000 390156B 39,990.56 00000000000	MEDICARE AVERITUS MEDICARE 39,990.56	0.00	0.00
0001105	PROV REMITINDEPENDENCE BLU 10,218.53	0.00	0.00
390156A 6,972.57 00000000000	MEDICARE AVERITUS MEDICARE 6,972.57	0.00	0.00
0001023	PROV REMITINDEPENDENCE BLU 192.28	0.00	0.00
192.28 000000000000 39\$156B	MEDICARE AVERITUS MEDICARE 113.25	0.00	00.0
113.25 000000000000 0001105 105,106.19 ACH Credits T	PROV REMITAMERIHEALTH NI 105,106.19	0.00	Q,00
105,106.19 ACH Credits 1	CHALL		

N. Ley Transfer CR-Wire

Money Transfer CR-Wire 9,725.72 0.00 0.00

FED WIRE IN 017918
ORIGINATOR:FIRST NATIONAL BANK OF MONTANA LIBBY MT
FIRST NATIONAL BANK OF MONTANA, INC ABA:092102851

ID:6102782060

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INACLE Previous Day Detail Report

12/17/99

OBI:PNC BANK NATIONAL ASSOCIATION PHILADELPHIA PA
BBI:HOSPITAL BATCH #20112149 CSI HOSP PATIENT LOAN PRGM
FNDG BENEFICIARY:MERCY CATHOLIC MEDICAL CENTER
AC/8611336132 MERCY CATHOLIC MEDICAL CENTER 8611336132
PHILADELPHIA PA ATTN DOUG SMITH
TDN: 101216017918 FEDREE:00015 DATE:991216 TIME:1331

TRN:991216017918 FF	DREF:00015 DATE:991216 TIM	0,00	0.00
9,725.72 Money Transfer CR-W	ire Tots 9,725.72		
oin and Currency Deposited			
Coin and Currency Deposited	3,307.27	0.00	0.00
3,307.27 00000000000 MONEY ROOM DEP. 986.22 00000000000	COIN/CURRENCY 00000000 986.22	0.00	0.00
MONEY ROOM DEP 4,293.49 Coin and Ourrency De	. 001140010	0,00	0.00
eposits			# CD 00
Deposits	8,725.73	632.00	568.00
9,925.73 00000000000 DEPOSIT	022053531 363,00	0.00	0.00
363.00 00000000000 DEPOSIT	022047998	(32.00	568.00
10,288.73 Deposits Totals	9,088.73	632.00	
570,082.70 Credit Totals	357,404.70	207,579.00	5,099.00

ID:6102782060

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INACLE Previous Day Detail Report

2/23/99

\s-')ate: 12/21/99

PNC Bank, Philadelphia

611336132

USD MCMC DEPOSIT

Debit Transactions:

Amount Reference Number BA Debits

ZBA Debits

266,086.29 08612821607

FUNDS TRANSFER TO ACCT 8612821607

Credit Tran	sactions:			labilíry		•	
Amount	Reference N	umber	Żero Day Float	One Day Float	2+ Days Float		
ockbox Deposits			-				
Lockbox Depos	its		5.6(1.14	07.070.0	0 44,408.	ΛΛ	
79,748.14	00000008281		8,261.14	27,079.0	· · · · · · · · · · · · · · · · · · ·	.00	
	WHLS LBX DEI	8281	024717853	ec 000 0	0 685.	۸۸	
	00000008281		1,014.08	56,822.0	i) (65)	·Vu	
	WHLS LBX DEI	8281	024717948	10.145.0	772	00	
16,680.08	00000008281		5,763.08	10,145.0	1/2	.00	
•	WHLS LBX DEI	8281	022813825	1 000		.00	
1,938.23	00000008265		100.23	1,838.0	y v.	.00	
•	WHLS LBX DE	8265	024716626	25.004.6	00 45,865	nn	
156,887.53	Lockbox Deposit	s Totals	15,138.53	95,884.0	K) 43,003	.00	
CH Credits							
ACH Credits	•			0.0	۸ ۸	.00	
58,123.04	00000000000		58,123.04		<i>.</i> 0	.00	
	0001105	PROV REMI	TINDEPENDENCE		na 0	.00	
19,640.81	00000000000		19,640.81		,,,	.00	
,	39015613	MEDICARE	AVERITUS MEDI		nn 0	.00	
4,877.29	00000000000		4,877.29		<u>"</u>	.00	
	390156A	MEDICARE	AVERITUS MEDI	CARE 0.0	n \	.00	
4,107.87	00000000000		4,107.87		,u •	.00	00608
	0001023	PROV REM	TINDEPENDENCI	O I	20 0	.00	
1,888.32	00000000000		1,888.32		<i>,</i> 0	.00	
	0001506	PROV REM	TINDEPENDENC		00	.00	
189.60	0000000000		189.60		00 u	1.00	
	0001105		ITAMERIHEALTH	NJ		0.00	
88,826.93	ACH Credits To	tals	88,826.93	0.	JU C	1.00	
·							
Money Transfer	CR-Wire						
Money Transfe	er CR-Wire				^ ^	0.00	
4,863.40			4,863.40) 0.	00 0	1.00	
	FED WIRE IN		007428		- v > 200		
	ORIGINATOR:	first natio	ONAL BANK OF M F MONTANA, INC	ONTANA LIBE	YMI		

FIRST NATIONAL BANK OF MONTANA, INC ABA:0921028 OBI:PNC BANK NATIONAL ASSOCIATION PHILADELPHIA PA BBI:HOSPITAL BATCH #20212169 CSI HOSP PATIENT LOAN PRGM FNDG BENEFICIARY: MERCY CATHOLIC MEDICAL CENTER AC/8611336132 MERCY CATHOLIC MEDICAL CENTER 8611336132 PHILADELPHIA PA ATTN DOUG SMITH TRN:991221007428 FEDREF:00003 DATE:991221 TIME:1108

ID:6102782060

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Business Account Statement

PNCBANK

ÉLIC MEDICAL CENTER

For the period 02/01/2000 to 02/29/2000

Account number:

86-1133-6132

Page 9 of 11

CH Credits	- continued	110	
īta -		119 transactions for a total of \$ 7,716,753.33	
ated	Аглоил		Reterenc
2/25	10,262.29	2 ACH Credit Prov Remit Independence Bin 0001023	пить
/25	7, 533.58	ACH Credit Medicare A Verius Medicare againgt	0002000054674092
,/25	3,900.00	ACH Credit Prov Remit Independence Blu 0005613	0002000055067543
/25	1,728.00	ACH Credit Prov Remit Independence Blu 0001678	0002000054674093
/25	271.49	ACH Credit Medicare A Veritus Medicare 390156A	0002000054674093
/28	50,357.64	ACH Credit Prov Remit Independence Blu 0001105	0002000055067543
/28	34,551.27	ACH Credit Medicare A Veritus Medicare 390156B	0002000055038765
/28	22,527.81	ACH Credit Medicare A Veritus Medicare 390156A	000200055172978
/28	5,713,20	ACH Gredit Prov Remit Independence Blu 0001028	0002000056172978
/28	1,690.00	ACH Credit Prov. Parrie 7 J.	00020000550387654
/29	48.835.19	ACH Credit Prov Remit Independence Blu 0001506	00020000550387682
729	18,366.93	ACH Credit Prov Remit Independence Blu 0001105	00020000551445203
²⁹	12 062 66	ACH Credit Medicare A Wellmark Inc. 891602	00020000593386573
′ 29	9,540.10	ACH Credit Prov Remit Independence Blu 0001023	00020000581445201
29		The state of the s	00020000592957118
	10.0F1,F	ACH Credit Medicare A Veritus Medicare 390156A	00020000592957117
	34.00	ACH Credit Prov Remit Amerihealth / NJ 0001023	00020000551445125
Transfer	rs In	2 transactions for a test 1 4 6 mm mag	
ب ^{ار} د.		2 transactions for a total of \$ 879,561.19	
rd .	Amount		Reterance
01	5,348.19	Fed Wire In 016602	number
16	874,213.00	Book Trn Credit 008647	W016602 0201
ustments	· · · · · · · · · · · · · · · · · · ·	The second secon	W008847 0218
HOUSERIES	• • •	7 transactions for a total of \$ 193,322.01	
od .	Amount	Transaction description	Reference
01	944.50	Credit Adjustment Ref: PGHADJ0000003440	number
02	46,524.30	Credit Memo	00101REF0000003440
77		Contract to the second	034429764
08	111.898.89	Credit Adjustment Ref: PGHADJ0000005221 Credit Adjustment Ref: PHLADJ0207009430	00101REF0000005221
11	125.00	Credit Memo	02001REF0207009430
16		Credit Memo	032773537
17			035601967
	20.00	Money Room Deposit Credit Adj. 00000000	02170480
er Credita		20 transactions for a total of \$ 4,276.90	
		Transaction	
d.	Amount	description	Reference
)8	419.00	PNC Merchant Deposit 178165012902	number
)7		PNC Merchant Deposit 178165014998 Value Date 02-05-00	178165012982 PHL 178165014998 PHL
. -	195.30	PNC Merchant Deposit 178165012992 ~	178165012982 PHL
P Life	371.10	PNC Merchant Deposit 178165013990	
4¥		PNC Merchant Deposit 178165012992 -	178185013990 PHL
9		PNC Merchant Deposit 178165012992 ~	178165012992 PHL
0		PNC Merchant Deposit 178165012992	178185012992 PHL
		COLON ALANGE NATIONAL ACCUSIONS AND A COLONIAL STREET STREET STREET STREET	

Case 2:02-cv-03608-JKG Document 57-2 Filed 01/31/2005 Page 19 of 50 FEB-25-03 13:34 FROM:SGH BUSINESS OFFICE ID:6102782060 PAGE 17/27 INACLE Previous Day Detail Report 2/2/00 5,348,19 5.348.19 0.00 0.00FED WIRE IN 016602 ORIGINATOR: FIRST NATIONAL BANK OF MONTANA LIBBY MT FIRST NATIONAL BANK OF MONTANA, INC ABA:(1921)02851 OBI:PNC BANK NATIONAL ASSOCIATION PHILADELPHIA PA BBI:HOSPITAL BATCH 20201280 CSI HOSP PATIENT LOAN PRGM FNDG BENEFICIARY: MERCY CATHOLIC MEDICAL CENTER AC/8611336132 MERCY CATHOLIC MEDICAL CENTER 8611336132 PHILADELPHIA PA ATTN DOUG SMITH TRN:000201016602 FEDREF:00003 DATE:000201 TIME:1258 5,348.19 Money Transfer CR-Wire Tors 5.348.19 0.00 0.00 etail Credit Adjustments Detail Credit Adjustments - 944.50 00000003440 944.50 0.00 0.00 CREDIT ADJUSTMENT REF: PGHADJ0000003440 944.50 Detail Credit Adjustments Total 944.50 0.00 0.00 oin and Currency Deposited

Coin and Currency Deposited 5,834.00 000000000000 5.834.00 0.00 0.00 MONEY ROOM DEP. COIN/CURRENCY 00000000 986.97 000000000000 986.97 0.00 0.00 MONEY ROOM DEP. COIN/CURRENCY 00000000 908.56 00000000000 908.56 0.00 0.00 MONEY ROOM DEP. COIN/CURRENCY 00000000 895.82 00000000000 895.82 0.00 0.00 MONEY ROOM DEP. COIN/CURRENCY 00000000 450.00 00000000000 450.00 0.00 0.00 MONEY ROOM DEP. COIN/CURRENCY 00000000) 9,075.35 Coin and Currency Deposited 9,075,35 0.00 0.00

)eposits Deposits -152,103.95 00000000000 100.95 152,003.00 0.00 DEPOSIT 029508934 <u>- 6,507.66 00000000000 |-3/</u> 1,762.66 4,705.00 40.00 DEPOSIT 022768904 158,611.61 Deposits Totals 1,863,61 156,708.00 40.00

253,094.60

362,557.00

32,240.00

647.891.60 Credit Totals

006083

ID: 6102782060

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PINACLE Previous Day Detail Report

2/17/00

As-Of Date: 2/16/00

F. 🗦 Bank, Philadelphia

8611336132

USD MCMC DEPOSIT

Debit Transactions:

Amount Reference Number

ZBA Debits

ZBA Debits

1,053,641.78 08612821607

FUNDS TRANSFER TO ACCT 8612821607

Coin and Currency Shipped

Coin and Currency Shipped

475.00 000000000000

MONEY ROOM ORDER COIN/CURRENCY 00000/000

350.00 000000000000

MONEY ROOM ORDER COIN/CURRENCY 00000000

825.00 Coin and Currency Shipped To

Reference Number

1,054,466.78 Debit Total

Credit Transactions:

Amount

Lockbox Deposits

kbox Deposits						
28,422.24 0000	00008281		100.24	26,156.00	2,166.00	
WH	ĻS LBX DEP	8281	025756966	20,100.00	2,100.00	
16,845.10 0000	00008281		113.10	16,650.00	82.00	
WH	LS LBX DEP	8281	025756927	,	U2.00	
516.41 0000			100.41	416,00	0.00	
	LS LBX DEP	8265	025759523		2.00	
45,783.75 Lock	cbox Deposits T	otals	313.75	43,222.00	2,248.00	
ACH Credits						
ACH Credits						
 40,730.59 0000	0000000		40,730,59	0.00	0.00	
0001	105 PR	OV REMITT	NDEPENDENCE BLU	4.00	0.00	000000
17,179.30 0000	0000000		17,179.30	0.00	0.00	006089
0001		OV REMITI	NDEPENDENCE BLU		0,00	
15,988.32 0000			15,988.32	0.00	0.00	
3 9 01		DICARE A	VERITUS MEDICARE			
2,675.65 0000			2,675.65	0.00	0.00	
3901	56A MI	EDICARE A	VERITUS MEDICARE			
200.00 0000			200.00	0.00	0.00	
0001		OV REMITI	NDEPENDENCE BLU			\land
76, 77 3.86 ACH	Credits Totals		76,773.86	0.00	0.00	. **

-- Availability ---

Zero Day Float One Day Float 2+ Days Float

Money Transfer CR-Other

Money Transfer CR-Other

874,213.00 BOOK TRANSFER CREDIT 874,213.00 0.00
ORIGINATOR:MERCY HEALTH CENTER AC/8611336204 ONE WEST
ELM STREET CONSHOHOCKEN,PA 19428 OBI:TRF FDS FR ACCT
8611336204 TO 8611336132, REF RACHAEL MEMO
BENEFICIARY:MERCY CATHOLIC MEDICAL CENTER AC/8611336132
TRN:000216008647 DATE:000216 TIME:1144

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Pago

ID:6102782050

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disiness Account Statement

PNCBANK

178204601995 PHL

178204601995 PHL

17820480\985 PHL

178204601995 PHL

178204501995 PHL

178204601995 PHL

178204801995 PHL

ATTY HOSPITAL _TH SYSTEM

02/09

02/11

02/18

02/22

02/28

02/29

02/

For the period 02/01/2000 to 02/29/2000

Account number:

86-1282-1594

Page 4 of 5

	ther Credits - continued	
CH Credits - con	tinued 58 transactions for a total of \$ 1,422,675.49	
ste . sated	Transaction Amount description	Reference
2/17	76,809.52 ACH Credit Medicare A Veritus Medicare 390215	numbe
2/17	26,697.00 ACH Credit Medicare A Veritus Medicare 398215	0002000047293954
2/17	18,602.98 ACH Credit Prov Remit Independence Blu 0001125	0002000047293954
2/18	81,969.28 ACH Credit Medicare A Veritus Medicare 390215	0002000046181393
2/18	7,745.86 ACH Credit Prov Remit Independence Blu 0001125	0002000048370868;
2/22	81,360.54 ACH Credit Medicare A Veritus Medicare 390215	00020000472721838
2/22	9,504.00 ACH Credit Prov Remit Independence Blu 0001125	00020000494228218
2/22		00020000483578786
2/ 2 3	20,564.43 ACH Credit Prov Remit Amerihealth 0001125	00020000483578753
2/23	17,550.00 ACH Credit Medicare A Veritus Medicare 398215	0002000053542702
2/23	11,155.55 ACH Credit Medicare A Veritus Medicare 390215	80020000535707411
2/23	9,508.41 ACH Credit Prov Remit Independence Blu 0001125	00020000535707415
2/24	47,369.44 ACH Credit Medicare A Veritus Medicare 390215	00020000494053503
2/24	30,949.00 ACH Credit Medicare A Veritus Medicare 395215	00020000847085988
2/24	8,204.94 ACH Credit Prov Remit Independence Blu 0001125	00020000547085984
2/1)	110,261.98 ACH Credit Medicare A Veritus Medicare 390215	00020000535436040
2/25	45,023.00 ACH Credit Medicare A Verirus Medicare 398215	00020000550675437
2/25	20,679.35 ACH Credit Prov Remit Independence Blu 0001125	00020000550675433
2/28	15,268.72 ACH Credit Medicare A Veritus Medicare 390215	00020000545740934
2/28	9,450.00 ACH Credit Medicare A Veritus Medicare 395215	00020000561729783
2/28	3,142.88 ACH Credit Prov Remit Independence Blu 0001125	00020000561729778
2/28	233.70 ACH Credit Prov Remit Amerihealth / NJ 0001125	00020000550387659
2/29	9,450.00 ACH Credit Medicare A Veritus Medicare 398215	00020000550387340
2/29	9,269.36 ACH Credit Prov Remit Independence Blu 0001125	00020000582957115
2/29	6,803.73 ACH Credit Medicare A Veritus Medicare 390215	00020000561445206
	of the state of th	0002000059295 7 119
unds Transfers in	1 transaction for a total of \$ 2,632.94	
ite sted	Transaction	Reference
2/11	Amount description 00603	number number
	Amount description CS CS CS CO CO CS	W023860 0211
ther Credits	10 transactions for a total of \$ 4,593,40	
ie eled	Transaction	Reference
1/0 4		սոարեւ
2/07		178204501995 PHL
,	V1,996.00 PNC Merchant Deposit 178204601995 Value Date 02-05-00	178204801995 PHL
/08	15.00 PNC Merchant Deposit 178204601995	17536/RAYAGE AUU
200	700 10 701701	178204601995 PHL

178204601995

178204601995

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178204601995

178204601995

178204601995

39.40 PNC Merchant Deposit

798.00 PNC Merchant Deposit

✓ 39.00 PNC Merchant Deposit

5.00 PNC Merchant Deposit

Value Date 02-26-00

30.00 PNC Merchant Deposit

√39.00 PNC Merchant Deposit

1,602.00 PNC Merchant Deposit

ID:6102782050

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'INACLE Previous Day Detail Report

798.00 Miscellaneous Credits Totals

2/14/00

0.00

0.00

is-f Pate: 2/11/00

?NU Bank, Philadelphia

612821594

USD MCH DEPOSIT

Debit Transactions:

Amount	Reference Number			
BA Debits				
ZBA Debits				
105,488.24 08	611336159			
FU	INDS TRANSFER TO	ACCT 8611336159		

Credit Trans	actions:		ilability		
Amount	Reference Number	Zero Day Float	One Day Float	2+ Days Float	
ockbox Deposits					-
Lockbox Deposit					
13,928.83 00	0000008279	153.83	13,775.00	0.00	
N.	HLS LBX DEP 8279	028671593			
6,226.62 00		2,920.62	3,306,00	0.00	
	THIS LBX DEP 8279	022535277			
20,155.45 L	ockbox Deposits Totals	3,074.45	17,081.00	0.00	
ACH Credits					
Credits					
61,353.65 00	000000000	61,353.65	0.00	0.00	
		AVERITUS MEDIO		2.00	
14,086.92 00		14,086.92		0.00	٠
		ITINDEPENDENCI			
5,974.00 00		5,974.00		0.00	
39	S215 MEDICARE	AVERITUS MEDIC			
100.00 00		100.00		0.00	
00	001125 PROV REM	ITAMERIHEALTH			
81,514.57 A	CH Credits Totals	81,514.57	0.00	0.00	-
Money Transfer CI	1_Wire				
Money Transfer C					
2,632.94	40 W HC	2,632.94	0.00	0.00	
-	ED WIRE IN	023860	0.00	0.00	
	riginator:first natio		ጎእጥልአነል ነ ሙድጭ	MT	
	RST NATIONAL BANK O			W1 1	00609
O.	BLPNC BANK NATIONAL	LASSOCIATION DE	MIANUT PHYA DA		00003
	BI:HOSPITAL BATCH#				
	RGM FNDG BENEFICIAR'				
	C/8612821594 MERCY CO				
	III.ADELPHIA PA	MEMORITI I INCALII	PK(1707100 HV.		
	UN:000211023860 FEDREF	ነ-ብብብ 1 <i>2 ነ</i> ገ ል ምፑ-ብብሳን ነ	1 TIME:1602		
	oney Transfer CR-Wire Tota		0.00	0.00	-
E, U.S. J. 181	DEG TIMBER OR WHO TOD	2,032.74	0.00	0.00	
A - Ilaneous Cred	its				
scellaneous Cre	dits				
scellaneous Cre		798.00	0.00	0.00	

FEG-25-03 13:36 FROM:SGH BUSINESS OFFICE ID:6102782060 ALLUMIA PAGE 22/27 For the period 04/01/2000 to 04/30/2000 Account number: 86-1282-1594 Page 4 of 5 Jer Credits - continued Jinued 52 transactions for a total of \$ 1.075.087.57 Transaction Reference Amount description numbar 4,804.77 ACH Credit Medicare A Veritus Medicare 390215 00020001093786575 13,936.53 ACH Credit Prov Remit Independence Blu 0001125 00020001093557131 3,245.24 ACH Credit Medicare A Veritus Medicare 390215 00020001104884579 180.20 ACH Credit Prov Remit Amerikealth / NI 0001125 00020001093556885 156,469.58 VACH Credit Medicare A Veritus Medicare 390215 00020001115510896 24.778.00 ACH Credit Medicare A Veritus Medicare 398215 00020001115510892 3,280.25 ACH Credit Prov Remit Independence Blu 0001125 00020001104641638 14,773.92 ACH Credit Prov Remit Independence Blu 0001125 00020001115444548 3.357.57 ACH Credit Medicare A Veritus Medicare 390215 00020001158360278 15,568.45 ACH Credit Medicare A Veritus Medicare 390215 00020001156752374 18,878.83 ACH Credit Prov Remit Independence Blu 0001125 00020001156751596 9,509.10 v ACH Credit Medicare A Veritus Medicare 390215 00020001160620517 /26 3,184.14 ACH Credit Prov Remit Independence Blu 0001125 00020001156552695 8.216.88 ACH Credit Medicare A Veritus Medicare 390215 04/27 00020001172093519 04/27 5,768.88 ACH Credit Prov Remit Independence Blu 0001125 00020001160135218 04/272,289.00 ACH Credit Prov Remit Amerikealth 0001125 00020001160135146 04 /~ 3 110,152.09 ACH Credit Medicare A Veritus Medicare 390215 00020001183083165 34,898.00 WCH Credit Medicare A Veritus Medicare 39S215 $04/_{-1}$ 00020001183083161 04/2811,839.34 ACH Credit Prov Remit Independence Blu 0001125 00020001171588362 04/2816.70 ACH Credit Prov Remit Amerikealth / NJ 0001125 00020001171687354 Funda Transfers In 1 transaction for a total of \$ 97,414.93 Transaction Date Reference COSTEC ...Amount description number Bky Montana 04/24 97.414.98 Fed Wire In 007911 .--W007911 0424 2 transactions for a total of \$81.00 Adjustments Date Transaction Reference 006092 Amount déscription posted number 04/10 45.00 VCredit Memo 032128**7**10 36.00 Deposit Adjint 94262 04/10 027212322 Other Credits 14 transactions for a total of \$ 2,273.00 Deta Reference posted Amount description numbar 35.00 VPNC Merchant Deposit 04/04 178204601995 178204601995 PHL 04/06 15.00 PNC Merchant Deposit 178204601995 178204601995 PHL 15.00 PNC Merchant Deposit 04/07 178204601995 178204601995 PHL 04/10 1,145.00 PNC Merchant Deposit 178204601995 178204801995 PHL Value Date 04-08-00 04/11 25.00 YPNC Merchant Deposit 178204601995 178204801995 PHL 39.00 PNC Merchant Deposit 178204601995 04/12178204601995 PHL 3 5.00 PNG Merchant Deposit 178204601095 178204801995 PHL 25,00 TPNG Merchant Deposit 178204601995 178204601995 PHL 0/17/14 04/1715.00 PNC Merchant Deposit 178204601995 178204501995 PHL Value B ar 04/1900 0421875.00 PNC Merchant Deposit 178204601995 178204601995 PHL

ID:6102782080

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PINACLE Previous Day Detail Report

4/26/00

^COf Date: 4/24/00 .√C Bank, Philadelphia

8612821594

USD MCH DEPOSIT

Debit Transactions:

ZBA Debits
ZBA Debits
ZBA Debits
154,345.93 08611336159
FUNDS TRANSFER TO ACCT 8611336159

Amount Reference Number Zero Day Float One Day Float 2+ Days Float Lockbox Deposits	Credit Trai	wactions:	_	· Ava	ıllability	
Lockbox Deposits Lockbox Dep			Number	Zero Day Float	One Day Float	2+ Dave Flast
36,891.39 00000008279						at days Flust
WHIS LBX DEP 8279 027188647 36,891.39 Lockbox Deposits Totals 4,174.39 24,892.00 7,825.00 ACH Credits ACH Credits ACH Credits ACH Credits ACH Credits ACH Credits 14,773.92 0000000000 0001125 PROV REMITTNDEPENDENCE BI.JU 3,357.57 00000000000 390215 MEDICARE AVERITUS MEDICARE 18,131.49 ACH Credits Totals 18,131.49 0.00 0.00 floney Transfer CR-Wire Money Transfer CR-Wire 97,414.93 97,414.93 0.00 0.00 FED WIRE IN 007911 ORIGINATOR:FIRST NATIONAL BANK OF MONTANA LIBBY MT FIRST NATIONAL BANK OF MONTANA, INC ABA:092102851 OBL-PNC BANK NATIONAL ASSOCIATION PHILADELPHIA PA BBI:HOSPITAL BATCH# 20404180 CSI HOSP PATIENT LOAN PRGM FNDG BENEFICIARY:MERCY COMMUNITY HOSPITAL AC/8612821594 MERCY COMMUNITY HOSPITAL BAICH# 20404180 CSI HOSP PATIENT LOAN PRGM FNDG BENEFICIARY:MERCY COMMUNITY HOSPITAL AC/8612821594 MERCY COMMUNITY HOSPITAL 8612821594 PHILADELPHIA PA TRN:000424007911 FEDREF:00011 DATE:000424 TIME:1227 97,414.93 Money Transfer CR-Wire Total 97,414.93 0.00 0.00 EPOSIT 028551531 - 769.51 00000000000 463.61 675.00 0.00 DEPOSIT 028551525 1,908.12 Deposits Totals 946.12 962.00 0.00						
WHIS LBX DEP 8279 027188647 36,391.39 Lockbox Deposits Totals 4,174.39 24,892.00 7,825.00 ACH Credits ACH CROMO ACH CREDITS ACH CREDITS ACH CREDITS ACH CREDITS ACH CREDITS				4,174,39	24 892 00	7 825 00
ACH Credits ACH Credits 14,773.92 00000000000 0001125 PROV REMITINDEPENDENCE BILU 3,357.57 00000000000 18,131.49 ACH Credits Totals 18,131.49 0.00 0.00 18,131.49 ACH Credits Totals 18,131.49 0.00 0.00 18,131.49 ACH Credits Totals 18,131.49 0.00 0.00 1000 Transfer CR-Wire 97,414.93 97,414.93 0.00 0.00 FED WIRE IN 007911 ORIGINATOR:FIRST NATIONAL BANK OF MONTANA LIBBY MT FIRST NATIONAL BANK OF MONTANA, INC ABA:092102851 OBI-PNC BANK NATIONAL ASSOCIATION PHIL ADELPHIA PA BBL:HOSPITAL BATCH# 20404180 CSI HOSP PATIENT LOAN PROM FNDG BENEFICIARY:MERCY COMMUNITY HOSPITAL AC/8612821594 MERCY COMMUNITY HOSPITAL 8612821594 PHILADELPHIA PA TRN:000424007911 FEDREF:00011 DATE:000424 TIME:1227 97,414.93 Money Transfer CR-Wire Told 97,414.93 0.00 0.00 1000 1000 11,138.61 00000000000 463.61 675.00 0.00 DEPOSIT 028551531 287.00 0.00 DEPOSIT 028551525 1,508.12 Deposits Totals 946.12 962.00 0.00					0.1,070.00	7,043,00
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Case 2:02-cv-03608-JKG Filed 01/31/2005 Page 25 of 50 Document 57-2

YEE-25-03 13:35 FROM:SGH BUSINESS OFFICE ID:6102782060 Business Account Statement PAGE 19/27 PNCBANK MEDICAL CENTER For the period 04/01/2006 to 04/30/2000 SYSTEM Account number: 86-1133-6132 Page 9 of 11 osits and Other Credits - continued Credits - continued 110 transactions for a total of \$ 7,932,894.67 Transaction besec Amount description 4/28Reference 3,300.60 V ACH Credit Medicare A Veritus Medicare 890156A number -1/28143.86 ACH Credit Settlement 00020001183083163 American Express 2374958412 00020001193426901 unds Transfers In 2 transactions for a total of \$ 407,058.40 ala Transaction osted Amount description Raferance 4/24227,026.62 Fed Wire In 007913 number 4/24 180,031.781/Fed Wire In 007910 W007813 0424 W007910 0424 djustments 4 transactions for a total of \$ 570,00 ele Transaction oated) Amountdescription 4/13 Reference 19.00 Money Room Deposit Gredit Adj. number 00000000 VALUE DATE 04-11-00 04130508 4/18500.00 Money Room Deposit Credit Adj. 00000000 4/241.00 Money Room Deposit Credit Adj. 04130505 00000000 VALUE DATE 04-21-00 04240958 50.00 Deposit Adjmt 95094 027397116 Cradits 16 transactions for a total of \$ 3,992.88 Ste Transaction sted Amount description Reference 4/03 122.50 PNC Merchant Deposit number 178165012992 006094 Value Date 0+01-00 178165012992 PHL 1/04 165.00 PNC Merchant Deposit 178165012992 1/06 45.00 PNC Merchant Deposit 178165012992 178165012992 4/07 130.00 178165012892 PNC Merchant Deposit 178165012992 ₹/11 800.00 PNC Merchant Deposit 178165012992 178165018990 1/11 80.00 PNC Merchant Deposit 178165013880 PHL 178165012992 1/12 (90.00 PNC Merchant Deposit 178165012992 PHL 178165012992 1/13 775.00 PNC Merchant Deposit 178165012982 PHL 178165014998 1/18 77.38 PNC Merchant Deposit 178165014998 PHL 178165012992 1/13 35.00 VPNC Merchant Deposit 178165012982 PHL 178165013990 711 270.00 PNC Merchant Deposit 178185013990 PHL 178165012992 117 245.00 PNC Merchant Deposit 178185012992 PHL 178165012992 Value Date 04-15-00 178165012982 PHL /25165.00 ENC Merchant Deposit 178165012992 ./2615.00 NNC Merchant Deposit 178155012982 PHL 178165013990 /27 925.00 PNC Merchant Deposit 178165013990 PHL 178165014998 /2858.00 PNC Merchant Deposit 178185014998 PHL 178165012992 178165012992 PHL liecks and Other Debits .ed Items 4 transactions for a total of \$ 6,225.59 Transaction Asscription Reference /03 Ret Dep Item Frozen 0000000000 number 020 /10 150.00 Return Dep Item Summary 032928347247

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PINACLE Previous Day Detail Report

4/26/00

Al-uf Date: 4/24/00

PNC Bank, Philadelphia

8611336132

USD MCMC DEPOSIT

Debit Transactions:

Amoust Reference Number

ZBA Debin

ZBA Debits

623,142.44 08612821607

FUNDS TRANSFER TO ACCT 8612821607

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	0000008265	0255	027818474	,	
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	WHIS LEX DEP	8203	252.23	2,020.00	279.00
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'	WHILS LBX DEP	8201	2,244.53	0.00	0.00
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LOAN PRGM FNDG BENEFICIARY:MERCY CATHOLIC MEDICAL

ID:6102782060

PAGE 21/27

# PINACLE Previous Day Detail Report

4/26/00

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MONEY ROOM Deposited 5,149.93		
		226.00
Deposits 101.47	196.00	228.00
		226.0
127397113	196.00	220.0
neposii		6,225.0
523.47 Deposits Totals	23,009.00	6,223.0
593,908.44		

006098

## Corporate Business Account Statement

#### **©** PNCBANK

For the period 09/01/2000 to 09/30/2000

MERCY CATHOLIC MEDICAL CENTER
MERCY HEALTH SYSTEM
GENERAL ACCOUNTING DEPT 2ND FL
1 W ELM ST
CONSHOHOCKEN PA 19428-2007

Account number:

86-1282-1607

Page 1 of 4

Number of enclosures: 0 Tax ID Number: 23-1352191

For Client Services: Call 1-877-824-5001

Visit us at www.treasury.pncbank.com

Write to: Client Services
19TH Floor
1600 Market Street
Philadelphia , PA 19103

1ccount	Summary	Information
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Balance Summ	ary					
	8	eginning balance	Deposits and other credits	Checks and other debits	Ending balanca	
	235,	703.00	23,956,385.54	23,904,389.54	287,649.00	
eposits and 0	ther Credits			Checks and Other D	ebit <b>s</b>	
ascription		ltems	Amount	Description	Items	Amount
Deposits	ڼ	0	0.00	Checks	, 0	0.00
iari al Lockbox		0	9200	Returned Items	0	0.00
Ci _redits		0	(0.00)	ACH Debits	0	0.00
)ls Transfers II	n	2	2,816,317.60	Funds Transfers Out	1	525,000.00
rade Services		2	107,576.64	Trade Services	2	107,576.64
grestments		0	0.00	Investments	0	0.00
ero Balance Tran	isfers	34	21,032,441.30	Zero Balance Transfers	6	6,537,347.72
djusiments		0	0.00	Adjustments	0	0.00
Other Gredits		0	0.00	Other Debits	54	16,734,465.18
otal		38	23,956,335.54	Total	63	23,904,389.54
edger Balance						
274	Ladger balance		Date	Ledger balance	Date	Ledger balance
9/01	305,376.00		09/13	99,096.00 208,289.00	09/22	128,034.00 282,705.00
9/ <b>05</b> 9/06	1,139,298.00 804,708.00		09/14 09/15	58,731.00	09/25 09/26	106,295.00
9/07	27,447.00		09/18	44,608.00	U9/27	127,990.00
9/08 9/11	17,539.00 741,182.00		09/19 09/20	1,287,496.00 176.029.00	09/28 09/29	162,319.00 287,649.00
9/11	519,944.00		09/21	161,823.00	008	

#### eposits and Other Credits

unds Transfers In		2 transactions for a total of \$ 2,816,317.60	
ife :sted	Amount	Transaction description	Reference number
0/12	116,317.60	Fed Wire In 007669	W007659 D912
9/19	2,700,000.00	Book Trn Credit 016495	W018495 0919

rage Services		2 transactions for a total of \$ 107,576.64	
)) <b>be</b>	Ameunt	Transaction description	Reference number
7/29	100,000.00	Standby L/C Cred 000000002208339966	LCS - COR 020 - 020
1/29	7,576.64	Standby L/C Cred 000000002208839966	LCS - COR 020 - 020

FEB-21-03 16:51 FROM: SGH BUSINESS OFFICE

ID:6102782060

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#### **Business Account Statement**

#### **Q**PNCBAK

IC MEDICAL CENTER

For the period 01/01/2001 to 01/31/2001

Account number:

86-1133-6132

Page 10 of 13

Credits - continued		128 transactions for a total of \$ 7,529,968.27		
		Transaction	Rafarano	
в <b>d</b> '29	Amount ee es	description	numbe	
29	58.52	ACH Credit Sculement American Express 2374253412	00020010262340023	
30	40,508.45	ACH Credit Prov Remit Independence Blu 0001105	0002001026198147	
30	9,475.23	ACH Credit Prov Remit Independence Blu 0001023	00020010261981473	
30		ACH Credit Medicare A Veritus Medicare S90156B	00020010293269376 00020010261981483	
30	6,588,00	ACH Credit Prov Remit Independence Blu 0001678		
30	3,247.84	AGH Credit Medicare A Veritus Medicare 390156A	00020010293269375 00020010292914222	
80	(148.00)	ACH Credit Settlement Novus Setvices 601101805423517		
31	88,214.67	ACH Credit Prov Remit Independence Blu 0001105	00020010292929429	
31		ACH Credit Prov Remit Independence Blu 0001023	00020010292929427	
31		ACH Credit Medicare A Veritus Medicare 390156B	00020010292828427	
31		ACH Credit Medicare A Veritus Medicare \$90156A		
ds Transfers In		2 transactions for a total of \$ 261,573.88		
		Transaction	Référence	
<b>d</b>		description  The Addition for ASING ASI	บ⊓Wp≠l	
. 💄		Fed Wire In 020306	W020308 0125	
, ,	98,730.75	Fed Wire In 020304	W020304 0125	
o Balance Transfers		1 transaction for a total of \$ 67,665.10		
d	Amount	Transaction description		
30		Funds Transfer From Acct 8612821607		
ustments		5 transactions for a total of \$ 995.00		
ıd	Amount	Transaction description	Reference number	
08		Money Room Deposit Credit Adj. 00000000	01080942	
17	100.00	TO DESCRIPTION OF THE PROPERTY	01170458	
19	5.00	Money Room Deposit Credit Adj. 00000000 00 0 0 0 0 0 0 0 0 0 0 0 0 0	01190446	
24	30.00	Money Room Deposit Credit Adj. 00000000	01240452	
31 /2///	850.0tf	Credit Memo	027005572	
10414		•		
3] /2/14 er Credits		26 transactions for a total of \$ 7,031.00		
er Credits		Transaction	Rafarénsa	
er Credits	America	Transaction description	number	
er Credits	America	Transaction		
er Credits d . )2	Amount 578.50	Transaction description PNC Merchant Deposit 178165012992 Value Date 12-40-00	number	
er Credits d . )2 )3	578,50 147,50	Transaction description  PNC Merchant Deposit 178165012992 Value Date 12-40-00  PNC Merchant Deposit 178165012992	number 178165012982 PHL	
er Credits d . D2 D3 D3	578,50 147,50 127,00	Transaction description  PNC Merchant Deposit 178165012992 Value Date 12-40-00  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992	number 178165012992 PHL 178165012992 PHL	
er Credits d . 02 08 04 05	578.50 147.50 127.00 75.00	Transaction description  PNC Merchant Deposit 178165012992 Value Date 12-30-00  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165013990	number 178165012992 PHL 178165012992 PHL 178165012992 PHL	
er Credits  d . 02 08 04 05	578.50 147.50 127.00 75.00 50.00	Transaction description  PNC Merchant Deposit 178165012992 Value Date 12-40-00  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012990  Value Date 01-06-01	number 178165012992 PHL 178165012992 PHL 178165012992 PHL 178165012992 PHL	
er Credits  d . 02 03 04 05	578.50 147.50 127.00 75.00 50.00	Transaction description  PNC Merchant Deposit 178165012992 Value Date 12-30-00  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165013990  Value Date 01-06-01  PNC Merchant Deposit 178165012992	number 178165012992 PHL 178165012992 PHL 178165012992 PHL 178165013990 PHL 178165012992 PHL	
er Credits  0 2  0 8  0 4  0 5  0 7	578.50 147.50 127.00 75.00 50.00 911.00	Transaction description  PNC Merchant Deposit 178165012992 Value Date 12-40-00  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012992  PNC Merchant Deposit 178165012990  Value Date 01-06-01	number 178165012992 PHL 178165012992 PHL 178165012992 PHL 178165012992 PHL	

**EXHIBIT "G"** 

Case	2:02-cv-03f	508-JKG Document 57	2 ERD	Hed 01/31/2005	Page 31 of 50
1	1 UNITED STATES DISTRICT COURT				-
2	EASTERN DISTRICT OF PENNSYLVANIA			APPEARANCES	
3			]] 3		
			4	STEVENS & LE BY: STACEY	EE A. SCRIVANI, ESQUIRE
SOUTHEASTER	H SYSTEM OF N PENNSYLVANIA	: CIVIL ACTION : Case No. 01-CV-5681	5	RONALD 111 North Si	L. WILLIAMS, ESCUIPE
5	·	:	6	P.O. Box 679	nsylvania 19603-0679
6 v.		:	7	(610) 478-20	086 Tabo3-0879
7 CSI FINANCI		:	s	Counsel for Southeastern	Mercy Health System of Pennsylvania
			9		
	C. and CSI	: CIVIL ACTION : Consolidated	10	KITTREDGE. D	ONLEY, ELSON, FULLEM &
	Plaintiffs,		11	EMBICK, LLP	PHER M. BRUBAKER, ESQUIRE
11 v.		: :	12	421 Chestnut Fifth Floor	Street
12 MERCY HEALTH		: :	13	Philadelphia (215) 829-99	, Pennsylvania 19106 00
	V PENNSYLVANIA : Defendant.			Counsel for 1	First National Bank of
14			1.5	Montana, Inc	
15	Friday, (	October 17, 2003	16		
			17		
	16 Oral deposition of RUSS ERDMAN, 17 held at the Law Offices of Kittredge, Donley,		18		
18 Elson, Fullem & Embick, LLP, 421 Chestnut		1.9			
20 19106, comme	20 19106, commencing at 9:51 a.m., on the above		20		
21 date, by and before Veronica M. Mc Kee, 22 Professional Shorthand Reporter and Notary		21			
23 Public, Commissioner of Deeds.		22			
			23 24		

_				24	
1				3	
INDEX WITNESS PAGE		1	(By agreement of counsel,		
3			PAGE	2	the sealing, certification, and $f$ iling
4	4 RUSS ERDMAN		] ] 3	are waived; and all objections, except	
5				4	as to the form of the question, are
6	BY:	MR. BRUBAKER	4	5	reserved until the time of trial.)
7				6	
8		EXHIBITS		7	RUSS ERDMAN, after having been
9			PAGE	8	duly sworn, was examined and testified
10	NUMBER	DESCRIPTION	MARKED	9	as follows:
11	Erdman 1	Notice of deposition	7	10	
12	Erdman 2	Two page CSI document	72	11	EXAMINATION
13	Erdman 3	One page CSI document	112	12	
14	Erdman 4	Two page CSI document	142	13	BY MR. BRUBAKER:
15	Erdman 5	Three page CSI document	146	14	Q. Good morning, Mr. Erdman. My name is
16	Erdman 6	Two page CSI document	152	15	Christopher Moore Brubaker. I'm an attorney.
17	Erdman 7	E-mail correspondence	159	16	I represent the First National Bank of Montana
18	Erdman 8	CSI document, 41 pages	160	17	in a case pending in the Eastern District also
19	Erdman 9	Patient financial agreement	174	18	involving Mercy Health System and CSI
20	Erdman 10	Assignment of accounts		19 20	Financial.
21	Erdman 11	E-mail correspondence	217	21	First off, is it all right with you if
22	Erdman 12		252	22	I refer to Mercy Health System of Southeastern
23		Two page CSI document	257	23	Pennsylvania simply as Mercy?  A. Yes
	Erdman 13	Return reports	259	24	
24	Erdman 14	Bank statements	265	14"	Q. You'll understand what I am referring

Case 2:02-cv 03608-JKG Document P.F. 2 ERPINEW 01/31/2005 Page 32 of 50 113

did you create this for other people to

reference in their daily job activities?

- This was created for other people as 3 4
- well as myself to reference.
- 5 Who would the other people be who 6
- would use this?
- 7 Our staff.
- 8 Can you be a little more specific
- 9 about our staff?
- 10 Our supervisors and our staff. As I
- stated before, the 70 people that we had talked 11
- about in our patient accounting department. 12 13
- Okay, people within the accounting 14
- department. Looking at number one, ad hoc 15
- report is run to determine accounts that 16
- qualify for submission to CSI. And then it
- says, patient must have at least two 17
- statements. What does that mean? 18
- 19 That means that we must have at least
- sent out two statements to the patient. 20
- 21 So a statement being a bill?
- 22 Α. That's correct.
- 23 So you would have billed a patient
- 24 twice before any account was sent to CSI?

1 MS. SCRIVANI: Object to the 2 form. You can answer.

11

116

- THE WITNESS: In the beginning of the agreement we did not require two 5 statements to be sent to the patient. 6 We added that as a criteria to reduce the chance of CSI getting an account where the patient may have given the
- 8 9 wrong insurance or not provided 10 insurance at the time of the service,
- 11 thereby sending a statement to the 12 patient hoping the patient will
- 13 respond to us with that insurance 14 information.
- 15 BY MR. BRUBAKER:

16

115

- What if they respond with a payment?
- 17 Then they would post the payment to 18 the account.
- 19 And say you sent them a second
- statement and they made a payment. What would 20 21 happen?
- 22 That would be considered a contract
- 23 and would be set up in the system as such.
- 24 When you say a contract, what do you

- 1 mean?
- 2 A contract is when the patient
- requests to make payments and not pay the 3
- 4 account in full.
- 5 So you're saying if you received a
- partial payment from a patient two statements 6
  - in a row, you would consider that a term for
- 8 repayment?
- 9 Α. Correct.
- 10 Would that account be sent to CSI?
- 11 Α.
- 12 What would happen to an account that
- 13 was paid in full?
- 14 It would stay on our system for a
- period of time and then go to history. 15
- 16 But that account wouldn't be sent to 17
- CSI?
- 18 Α. No, it would not.
- 19 So then is it fair to say that the
- only accounts that were sent to CSI are those 20
- where the patient didn't make a payment for two 21
- 22 statements?
- 23 As I stated before, in the beginning
- of the engagement we did not require two 24

- 1 statements to be sent to the patient. 2
  - Subsequently, after a certain amount of time
  - 3 being in the program, we made that a
  - requirement to reduce the amount of accounts
  - that CSI might receive where a patient had
  - given the wrong insurance information. So if a
  - patient had made a payment at that point after
  - we had sent them one or two statements, that account would not have gone to CSI. 9
- 10 I think you answered my question but 11
  - maybe not directly. So if no payment were made, that account would go to CSI?
- 13 Α. Correct.
- 14 If a payment were made, that account 15 would not go to CSI?
- 16 Correct. Once we instituted this 17 process.
- 18 Do you know when you instituted this
- 19 process?

12

- 20 To the best of my recollection, fall
- of 2000, but it could be earlier. 21
- 22 Would there be any records that would
- indicate when this process took effect? 23 24
  - I believe there is a memo from Doug

EXHIBIT "H"

Document 57-2

#### Bob Jaeb

> 610,567,6601

> >

From: "Robert Jaeb" <b/>
<br/>
// Spine in ancial.com > "Robert Jaeb" <b "Smith, Doug" <dsmith@MERCYHEALTH:ORG> To: Sent: Tuesday, September 25, 2001 9:41 AM Subject: Doug: Thanks for the update. Bob -- Original Message ----From: "Smith, Doug" < dsmith@MERCYHEALTH ORG> To: <br/>
Siaeb@csifinancial.com> Sent: Tuesday, September 25, 2001 9:00 AM > Bob, > Thanks for your voice mail - we'll be preparing a new file to be out to > by Friday (or at the latest early nx week) > In the past 2 weeks since the attack in New York, our computer system has > been critically affected by three major virus intrusions, which have limited > or crippled our ability to send files. In addition, Russ was out sick for > part of that time. > We are now recovering (system and Russ) and back in operation. I believe > that the next file will also be a good sized one, and we will (or should be) > on an every other week exchange, as we committed. > There are still about three issues that need to be resolved. Pete said > he will be paying a call on me soon, so I can go over them with him. > Overall, things are improving, for which I am grateful. > Again, hopefully - barring any terrorist attacks, crippling computer > viruses, or employee illnesses - we should be on track every other month. > Thanks for your patience, > Doug Smith-

- -
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- > not authorized to receive this message, please contact the Mercy Health
- > System Helpdesk at engineeringhelpdesk@mercyhealth.org.
- >
- >

#### Bob Jaeb

From:

"Robert Jaeb" <bjaeb@csifinancial.com>

To:

"ERDMAN, RUSS" < RErdman@mercyhealth.org>

Sent:

Friday, September 28, 2001 11:05 AM

Subject:

New accounts

Russ

We MUST HAVE the NEW ACCOUNT transfer TODAY. The bank has a gun to both of our heads regarding the past due recourse balance. I have been telling them that we would be getting a large file to offset this as per my information from Doug. They will deem the contract to be in default at the close of business today. They will then make things very unpleasant.

PLEASE advise me immediately.

Bob Jaeb

## Bob Jaeb

From:

"Robert Jaeb" < bjaeb@csifinancial.com>

To:

"Smith, Doug" <dsmith@MERCYHEALTH.ORG>

Sent:

Friday, September 28, 2001 1:59 PM

Subject:

Re: New accounts

#### Doug:

Will this be the "big file" or a 2 week file? This is becoming a very sticky situation with the bank. They have to submit their quarterly data to the Feds and we have to get rid of the old recoursed accounts prior to then. I am honestly not sure that they are going to accept another delay. I hope you can understand the pressure that is coming down on me.

#### Bob

> Bob,

---- Original Message -----

From: "Smith, Doug" < dsmith@MERCYHEALTH.ORG>

To: < bjaeb@csifinancial.com>

Sent: Friday, September 28, 2001 11:40 AM

Subject: RE: New accounts

- > We will not be able to have the files until Tuesday or Wednesday next week > until we can create the AD-Hocs and run the files. That's the best we can > do. > \ > \ Doug Smith \ > 610.567.6601
- > >
- >> From: Robert Jaeb[SMTP:bjaeb@csifinancial.com]
- > > Sent: Friday, September 28, 2001 1:05 PM
- >> To: ERDMAN, RUSS >> Subject: New accounts
- >>
- >> Russ
- >>
- >> We MUST HAVE the NEW ACCOUNT transfer TODAY. The bank has a gun to both
- >> of our heads regarding the past due recourse balance. I have been
- >> telling them that we would be getting a large file to offset this as per
- >> my information from Doug. They will deem the contract to be in default

CSI 1436

```
>> at the close of business today. They will then make things very
>> unpleasant.
>>
> > PLEASE advise me immediately.
>>
>> Bob Jaeb
>>
>>
>>
>>
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> not authorized to receive this message, please contact the Mercy Health
> System Helpdesk at engineeringhelpdesk@mercyhealth.org.
```

Document 57-2

# Bob Jaeb

From:

"Robert Jaeb" <bjaeb@csifinancial.com>

To:

"Smith, Doug" <dsmith@MERCYHEALTH.ORG>

Document 57-2

Sent:

Friday, September 28, 2001 2:08 PM

Subject:

Re: New accounts

It was my understanding that you were going to send us a file for the 3 month period that we did not receive any accounts for.

Bob

original Message ----

From: "Smith, Doug" < dsmith@MERCYHEALTH.ORG>

To: "'Robert Jaeb'" < bjaeb@csifinancial.com> Sent: Friday, September 28, 2001 1:51 PM

Subject: RE: New accounts

- > Bob.
- > AT this point in time, I honestly have no way of judging what will qualify
- > fore the file. We will be on an every other week placement, as I said

before

> from now on.

- > Doug Smith

- >> From: Robert Jaeb[SMTP:bjaeb@csifinancial.com]
- >> Sent: Friday, September 28, 2001 3:59 PM
- >> To: Smith, Doug
- >> Subject: Re: New accounts
- >>
- >> Doug:
- >> Will this be the "big file" or a 2 week file? This is becoming a very
- >> sticky situation with the bank. They have to submit their quarterly data.
- >> to
- >> the Feds and we have to get rid of the old recoursed accounts prior to
- >> I am honestly not sure that they are going to accept another delay. I
- >> you can understand the pressure that is coming down on me.
- >>
- > > Bob
- >>
- >> ---- Original Message ----
- >> From: "Smith, Doug" < dsmith@MERCYHEALTH.ORG>
- >> To: <br/>
  <br/>

CSI 1438

```
>> Sent: Friday, September 28, 2001 11:40 AM
>> Subject: RE: New accounts
 >>
 >>
 >>> Bob.
>>>
>>> We will not be able to have the files until Tuesday or Wednesday next
>>> until we can create the AD-Hocs and run the files. That's the best we
>>> do.
>>>
>>>
>>> Doug Smith
>>> 610.567.6601
>>>
>>>
>>> From: Robert Jaeb[SMTP:bjaeb@csifinancial.com]
>>> Sent: Friday, September 28, 2001 1:05 PM
>>> To: ERDMAN, RUSS
>>>> Subject: New accounts
>>>>
>>> Russ
>>>>
>>>> We MUST HAVE the NEW ACCOUNT transfer TODAY. The bank has a gun to
>>>> of our heads regarding the past due recourse balance. I have been
>>>> telling them that we would be getting a large file to offset this as
>> per
>>>> my information from Doug. They will deem the contract to be in
>>>> at the close of business today. They will then make things very
>>>> unpleasant.
>>>>
>>> PLEASE advise me immediately.
>>> Bob Jaeb
>>>>
>>>>
>>>>
>>>>
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>> herein
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> not authorized to receive this message, please contact the Mercy Health
> System Helpdesk at engineeringhelpdesk@mercyhealth.org.
>
```

# Bob Jaeb

From:

"Robert Jaeb" <bjaeb@csifinancial.com>

To:

"Smith, Doug" <dsmith@MERCYHEALTH.ORG>

Cc:

"Partain, Bill" <wepartain_02@bankersresource.com>; "Kaiser, Ken"

<kwkaiser_02@bankersresource.com>

Sent:

Friday, September 28, 2001 2:41 PM

Subject:

RECOURSE

Doug:

The Bank wants \$1,084,733.50 wired to them immediately. They have been promised files for weeks.

Robert M. Jaeb President

Page 43 of 50age 1 of 1 Case 2:02-cv-03608-JKG Document 57-2 Filed 01/31/2005

## Bob Jaeb

From:

"Robert Jaeb" <bjaeb@csifinancial.com>
"Smith, Doug" <dsmith@MERCYHEALTH.ORG>; "ERDMAN, RUSS" To:

<RErdman@mercyhealth.org>

Friday, September 28, 2001 2:49 PM Sent:

Russ:

The bank will not wait. I just e-mailed Doug after advising him that the bank wants a file now or a wire transfer. I could process a file tomorrow. This is very serious.

Bob

#### Bob Jaeb

From:

"Robert Jaeb" <bjaeb@csifinancial.com>

To:

"Smith, Doug" < dsmith@MERCYHEALTH.ORG>

Sent:

Friday, September 28, 2001 3:07 PM

Subject:

Re: New accounts

#### Doug;

Can you send me any accounts tomorrow? We have to do something unless you can wire some funds.

#### Boh

---- Original Message ----

From: "Smith, Doug" < dsmith@MERCYHEALTH.ORG>

To: "Robert Jaeb" < biaeb@csifinancial.com> Sent: Friday, September 28, 2001 2:49 PM

Subject: RE: New accounts

- > We are trying to figure out how to qualify those accounts and then we have > to notify the Vendor (Collection Agency) that they were placed with that
- > wish to withdraw them so that 2 agencies are not collecting at the same
- > & we are not paying the Agency commissions on the payments receive from **CSI**
- > its more complicated that just creating a file, but it is something we
- > working on when the system isn't shut down (virus problem we had)
- > DS
- >
- >> From: Robert Jaeb[SMTP:bjaeb@csifinancial.com]
- >> Sent: Friday, September 28, 2001 4:08 PM
- >> To: Smith, Doug
- >> Subject: Re: New accounts
- >> It was my understanding that you were going to send us a file for the 3
- >> month period that we did not receive any accounts for.
- >>
- > > Bob
- >> original Message -----
- >> From: "Smith, Doug" < dsmith@MERCYHEALTH.ORG>
- >> To: "Robert Jaeb" < biaeb@csifinancial.com>
- >> Sent: Friday, September 28, 2001 1:51 PM
- > > Subject: RE: New accounts

```
>>
 >>
 >>> Bob:
 >>> AT this point in time, I honestly have no way of judging what will
 > > oualify
 >>> fore the file. We will be on an every other week placement, as I said
 >> before
 >>> from now on.
 >>>
 >>> Doug Smith
 >>>
 >>> From: Robert Jaeb[SMTP:bjaeb@csifinancial.com]
 >>> Sent: Friday, September 28, 2001 3:59 PM
 >>> To: Smith, Doug
 >>>> Subject: Re: New accounts
 >>>>
 >>> Doug:
 >>>>
 >>>> Will this be the "big file" or a 2 week file? This is becoming a
>>> sticky situation with the bank. They have to submit their quarterly
 > > data
 >>>>to
>>>> the Feds and we have to get rid of the old recoursed accounts prior
>>> then.
>>> I am honestly not sure that they are going to accept another delay.
>>>> hope
>>>> you can understand the pressure that is coming down on me.
>>>>
>>> Bob
>>>>
>>> ---- Original Message ----
>>> From: "Smith, Doug" < dsmith@MERCYHEALTH.ORG>
>>> To: <br/>
<a href="mailto:sifinancial.com"> biaeb@csifinancial.com"> sifinancial.com</a>
>>> Sent: Friday, September 28, 2001 11:40 AM
>>> Subject: RE: New accounts
>>>>
>>>>
>>>> Bob,
>>>>>
>>>> We will not be able to have the files until Tuesday or Wednesday
>> next
>>>> week
>>>> until we can create the AD-Hocs and run the files. That's the best
>> we
>>> can
>>>> do
```

Document 57-2

```
>>>>>
 >>>>>
 >>>> Doug Smith
 >>>> 610.567.6601
 >>>>>
 >>>>>
>>>>>
>>>>>
>>>> From: Robert Jaeb[SMTP:bjaeb@csifinancial.com]
>>>> Sent: Friday, September 28, 2001 1:05 PM
>>>>> To: ERDMAN, RUSS
>>>>> Subject: New accounts
>>>>>>
>>>> Russ
>>>>>>
>>>>> We MUST HAVE the NEW ACCOUNT transfer TODAY. The bank has a
gun
>> to
>>> both
>>>>> of our heads regarding the past due recourse balance. I have
>>>>> telling them that we would be getting a large file to offset
this
>> as
>>>> per
>>>>> my information from Doug. They will deem the contract to be in
>>>> default
>>>>> at the close of business today. They will then make things
very
>>>>> unpleasant.
>>>>>
>>>> PLEASE advise me immediately.
>>>>>>
>>>> Bob Jaeb
>>>>>
>>>>>>
>>>>>
>>>>>>
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>>>> are
>>>> not authorized to receive this message, please contact the Mercy
>> Health
>>>> System Helpdesk at engineeringhelpdesk@mercyhealth.org.
>>>>>
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> not authorized to receive this message, please contact the Mercy Health
> System Helpdesk at engineeringhelpdesk@mercyhealth.org.
>
```

## Bob Jaeb

From:

"Robert Jaeb" <bjaeb@csifinancial.com>

To: Cc: "Smith, Doug" <dsmith@MERCYHEALTH,ORG>
"ERDMAN, RUSS" <RErdman@mercyhealth.org>

Sent:

Thursday, October 04, 2001 9:11 AM

Subject: Recourse

Doug:

As I am sure you are aware, the recourse issue is out of hand. The bank wants their money now. The total due as of this morning is \$1,253,384.00. We have not applied any funds from Tuesday's batch of accounts yet. They are posting to the payment and returned account file first. I will call you in a few minutes to discuss this problem.

Bob

# **EXHIBIT "1"**

	<u> </u>
1	IN THE UNITED STATES DISTRICT COURT
2	FOR THE EASTERN DISTRICT OF PENNSYLVANIA  * * *
3	CIVIL ACTION NO. 01-CV-5681
4	SOUTHEASTERN PENNSYLVANIA,
5	Plaintiff, ':
6	VS.
7	CSI FINANCIAL, INC.,
8	Defendant.
9	FIRST NATIONAL BANK OF MONTANA, INC. AND CSI
10	FINANCIAL, INC., Plaintiffs,
11	VS.
12	MERCY HEALTH SYSTEM OF
13	SOUTHEASTERN PENNSYLVANIA, Defendant.
14	
15	* * * October 14, 2003
16	* * *
17	Oral sworn deposition of DOUGLAS
18	SMITH, held at the law offices of Kittredge,
19	Donley, Elson, Fullem & Embick, LLP, 421
20	Chestnut Street, Fifth Floor, Philadelphia,
21	Pennsylvania, commencing on or about 10:15 a.m.,
22	before Heather L. Ashton-Chee Wah, Certified
23	Shorthand Reporter and Notary Public.
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